

Magistrate Judge Ashman

1. Defendant was served summons in New York on May 14, 2008.
2. Defendant's answer to Plaintiff's complaint is due 20 days after service, June 3, 2008.
3. Despite due diligence, counsel will be unable to complete the answer by that date due to the below described circumstances.
4. Defendant retained Mark D. DeBofsky and Violet H. Borowski of Daley, DeBofsky & Bryant as counsel on June 3, 2008.
5. In order to accurately respond to the allegations in Plaintiff's complaint, Defendant requires a copy of the Plan. Defendant contacted Plaintiff's counsel, Julie Line

Bailey, on June 3, 2008 to request that she send us a complete copy of the Plan at issue, and Plaintiff agreed.

6. Defendant respectfully requests that she be given an additional 30 days through July 3, 2008, in which to submit an answer or otherwise plead.

5. Defendant contacted Plaintiff's counsel on June 3, 2008 and Plaintiff has no objection to this request.

WHEREFORE, Defendant respectfully requests that this court grant Defendant's motion for an extension through July 3, 2008.

Dated: June 5, 2008

s/ Mark D. DeBofsky  
Mark D. DeBofsky  
Attorney for Defendant

Daley, DeBofsky & Bryant  
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Chicago, IL 60603  
(312) 372-5200  
FAX (312) 372-2778

**CERTIFICATE OF SERVICE**

TO: Julie Line Bailey  
Gibson & Sharps  
745 McClintock Drive, Suite 227  
Burr Ridge, Illinois 60527

The undersigned attorney hereby certifies that on June 5, 2008, he electronically filed the foregoing motion with the Clerk of the Court using the CMF/ECF filing system, which sent notice of such filing to the above named attorney.

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s/ Mark D. DeBofsky

Attorney for Defendant  
Rosanne Hamel